

FILED

DEC - 1 2020
UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

(vi)

Philip J. Piserchio
1620 Claremont Drive
San Bruno, CA 94066
650-303-0833

(i) United States Bankruptcy Court
Northern District of California
San Francisco Division
450 Golden Gate Avenue
Mailbox 36099
San Francisco, CA 94102

Bankruptcy Case No. 19-30088 (DM)

Keller Benvenuti Kim LLP
650 California Street, Suite 1900
San Francisco, CA 94108

(ii) Re: Claim #2017, Response to Omnibus Objection

To: The US Bankruptcy Court, SF Division

(iii) Please accept this notice as my response (to the Fortieth Omnibus Objection) in regard to claim #2017 in the amount of \$13,489.00. PG&E was solely responsible for the damage to a commonly used trail (see attached original letter – and refer to original claim documentation) that caused a bicycle accident resulting in physical injury to me (broken pelvis and use of crutches for three months).

(iv) Email documentation with the National Park Service (NPS) verifies that PG&E was solely responsible for the damage to the publicly used trail, and did not fix it for over a year. Mark Andrews, a fellow mountain biker, has personal knowledge of this PG&E damage (contact information can be provided upon request) as well as the National Park Service and San Bruno Fire Department. Therefore, I ask that the court overrule this Omnibus Objection to claim #2017.

If you have any further questions, please contact me at 650-303-0833 or ppiserchio@hotmail.com.

Sincerely,



Philip J Piserchio
Creditor

March 16, 2019

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 3rd Avenue, Suite 412
Brooklyn, NY 11232

COPY OF ORIGINAL
CLAIM COVER
LETTER

Dear Sirs:

In 2017, PG&E damaged a significant part of National Park Service trail (in San Bruno/Pacifica, California – Baquiano Trail) during outages caused by storms. PG&E entered the areas of the trail without notice or permit, and failed to repair the damage for over one year. Multiple email and phone communications with the National Park Service (NPS) confirm that PG&E knew of these problems and were responsible for fixing the damaged trail. There was no signage or fencing to warn hikers or bikers.

Attached is a claim form in reference to a mountain bike accident on Baquiano Trail on June 4, 2017 causing multiple injuries (fractured pelvis/skin lacerations) and property damage (bike/phone/clothing). The following items are included:

- Claim Form
- Summary of Damages/Losses
- Email communications with NPS referencing PG&E.
- Receipts of Medical expenses and damages
- Pictures of me on crutches for 2 months following injury.

The employees spoken with at NPS are Gerald Scheuman, Corbett Robinson, Alison Forrestel, and Matt Wallat. You may search the public records if you need all the email communications between NPS and PG&E.

Lastly, the basis of my claim is that the trail where the accident happened was very dangerous, without sufficient signage or communications...but most of all, it was a known hazard 3 months earlier confirmed by an NPS email from Corbett Robinson to Mark Andrews (a fellow mountain biker) Feb 6, 2017 (email attached). If you have any clarifying questions, please contact me (information below). I'm very sorry for this claim, but, it was a very unfortunate time for me and my family.

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Accident on Sunday, June 4th,
2017...Ambulance, Fire
Department...crutches from June
4th to July 26th, 2017. Vicodin,
ibuprofen, advil, aspirin.

Bike Crash Losses

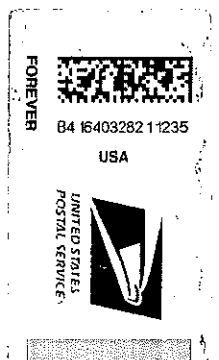
iPhone screen crack/broken connector	\$200.00 Not yet fixed	
Bike Wheel (back) broken	\$1,413.70 Paid	
Bike adjustments/work (Summit Bicycles Burlingame)	\$275.00 Paid	
Bike Helmet broken/unusable	\$200.00 Not yet replaced	
Broken Sunglasses	\$108.00 Paid	
Torn shorts/shirt	\$145.91 Paid	
Kaiser Bills	\$935.00 Paid	
	\$341.00 Paid	
Follow up visits/xrays	\$200.00 Paid	
Medications	\$75.00 Paid	
Ambulance Bill	\$915.63 Paid	
Lost work (sick days taken)	\$1,935.64 72 hrs sick time	<u>Pain/Sufferin</u> a times two
SUB-TOTAL	\$6,744.88	\$13,489.76

Pain/Suffering Descriptions

	Broken pelvis (email from Doctor)
Family Lake Tahoe vacation (June 18-24)	Crutches entire time - no activities with my children.
Family Cruise vacation (July 15- 24)	Crutches entire time - severely reduced activities.

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94102-341024

